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August 17, 2004

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

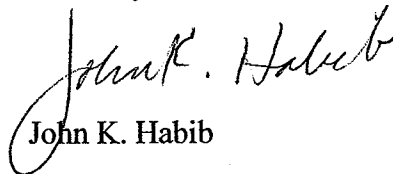
RE: New England Gas Company, D.T.E. 04-24

Dear Ms. Cottrell:

Please find attached the response of New England Gas Company (the "Company") to Information Requests DTE-2-1.

If you have any questions, please call me at your convenience.

Sincerely,


John K. Habib

Enclosures

cc: Jody Stiefel, Hearing Officer
Joseph Rogers, Assistant Attorney General
Robert Sydney, General Counsel, DOER
Peter Czekanski
Karen Czaplewski
Sharon Partridge

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
NEW ENGLAND GAS COMPANY
D.T.E. 04-24**

Dated: August 17, 2004
Respondent: Karen Czaplewski

Information Request DTE 2-1:

Please explain why ten years historical data is not available for the following SQ penalty measures and reporting requirements: Service Appointments; Telephone Answering; and Meter Reads.

Response:

Prior to Fall River and North Attleboro's merger with Southern Union, the two Companies did not formally measure service-quality performance. Under the terms of the merger approval, the Company was given an 18-month period to implement the systems necessary to measure and track service-quality data. Following the consummation of the mergers, the Company participated in the Department's generic service-quality proceeding, and consequently, began measuring performance during calendar year 2001 in accordance with the D.T.E.99-84 guidelines. With regard to the specific three categories identified in this information request, the Company's first annual service quality report (filed under cover letter dated March 7, 2002) provided the following explanation of data available:

Telephone Service Factor

Under section II.A of the Company's SQ Plans, the Company is required to collect and report statistics on the percentage of telephone calls from customers that are handled within a 20-second time interval. Until the issuance of D.T.E. 99-84 on June 29, 2001, neither Fall River nor North Attleboro compiled performance statistics on the telephone-response time. As of September 2001, Fall River began collecting data on the percentage of telephone calls handled within 20 seconds, including both emergency and non-emergency calls. In December 2001, the North Attleboro call center was relocated to Cumberland, Rhode Island (the offices of the former Valley Gas Company), and as of January 1, 2002, statistics will be compiled for North Attleboro in accordance with the 20-second standard (for both emergency and non-emergency calls). Thus as of December 31, 2001, there are no historical data upon which benchmarks could be calculated for this measure.

Appropriate benchmarks for this measure will be proposed for Fall River and

North Attleboro once the Company has compiled three years of historical performance data to serve as a basis for the benchmark calculation.

Service Appointments Met on the Same Day Requested

Under section II.B of the SQ Plans, Fall River and North Attleboro are required to gather data on the percentage of service appointments met by Company personnel on the same day requested. Neither company tracked this measure prior to the issuance of the Department's D.T.E. 99-84 order. Fall River and North Attleboro began tracking performance on this measure as of July 1, 2001, and the Company will establish appropriate benchmarks once it has compiled three years of historical performance data to serve as a basis for the benchmark calculation.

On-Cycle Meter Readings

Under section II.C of the SQ Plans, Fall River and North Attleboro are required to collect and report data on the percentage of meters that are actually read by a company, monthly. Fall River has 4 years of historical data available and has calculated a benchmark for this measure. North Attleboro did not measure meter reading performance prior to the D.T.E. 99-84 guidelines, and there, North Attleboro initiated a measurement process for this measure as of July 1, 2001.